

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

DARREN L. BUNCH, et al)
Plaintiffs,)
vs.) Case No. 4:18-cv-00439-BP
THE TRAVELERS INDEMNITY)
COMPANY OF CONNECTICUT,)
Defendant.)

MOTION TO AMEND SCHEDULING ORDER AND TRIAL DATE

COMES NOW, Plaintiffs Darren Bunch and Mandy Bunch, by and though counsel of record, Brad Bradshaw, MD, JD, LC and for his Motion to amend the scheduling order and trial date, states as follows:

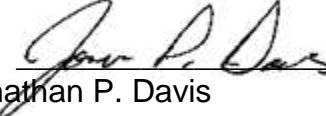
1. That plaintiff was injured as a result of the motor vehicle crash that occurred in Coconino County, Arizona on March 24, 2015.
2. That as a result of the crash, plaintiff underwent C5-6 and C6-7 disc replacement surgery, said surgery was performed by Dr. Matthew Gornet.
3. Dr. Gornet, plaintiff's treating surgeon, was deposed on January 17, 2019. At this deposition, Dr. Gornet opined that plaintiff will need future treatment.
4. That prior to that deposition, neither plaintiff nor plaintiff's counsel had knowledge and any future treatment that would be necessary.
5. That on March 19, 2019, Plaintiff is undergoing a nerve ablation to his lower back.
6. Due to the ongoing medical treatment, the extent of plaintiff's damages is unknown.
7. That based on Plaintiff's ongoing and future medical treatment, additional expert

testimony is likely.

8. That granting this motion to amend scheduling order and trial date will not unreasonably delay or prejudice defendants.
9. That plaintiff's proposed Amended Scheduling Order is attached as Exhibit A.

WHEREFORE, plaintiff prays the Court to enter a new scheduling order, including trial, and for such other and further relief as the Court deems just and proper in the premises.

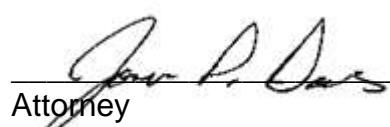
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By: 
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies
that a copy of the foregoing document
was electronically filed with the Clerk of the Court
which sent notification of such filing to all counsel of record,
on this the 12th day of March 2019, to:

Christopher Sorenson, Esq.
John Mullen, Esq.
Franke Schultz & Mullen, PC
8900 Ward Parkway
Kansas City, MO 64114
Attorneys for Defendant


Attorney